

Dated: 10/24/2020

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
COOKEVILLE DIVISION**

IN RE:	)	
	)	Case No. 2:19-bk-00138
ANGELIA NICHOLE SHOCKLEY,	)	Chapter 7
	)	Judge Marian F. Harrison
Debtor.	)	

**AGREED ORDER DELINEATING DISTRIBUTION OF PROCEEDS UPON SALE OF  
REAL PROPERTY BY THE ESTATE**

THIS MATTER IS BEFORE THE COURT upon the *Joint Motion for Entry of Agreed Order Delineating Distribution of Proceeds Upon Sale of Real Property by the Estate* (the “Motion”) filed by Erica R. Johnson, chapter 7 trustee (the “Trustee”) of the bankruptcy estate of Debtor Angelia Nichole Shockley (“Mr. Brubacher”), and Creditor Jason Brubacher, as representative of the bankruptcy estate pursuant to the *Order Granting Derivative Standing to Pursue Avoidance Actions* entered on April 17, 2019 (Docket No. 25) (the “Derivative Standing Order”). Any capitalized term not specifically defined herein shall have the meaning ascribed to it in the Motion.

Upon the agreement of Mr. Brubacher and the Trustee, as evidenced by the signatures of their respective counsel below, it is hereby ORDERED as follows:

1. The Motion is hereby GRANTED;

2. The distribution outlined in subsection (a) of Paragraph 5 of the Derivative Standing Order shall be amended and superseded to state as follows:

- a. First, to approved fees, costs and expenses incurred by counsel for Mr. Brubacher, acting with derivative standing to represent the estate, for pursuit and prosecution of such causes, and/or by the Chapter 7 Trustee, or her counsel, for fees, costs, and expenses incurred in the administration of the estate.
- b. All remaining proceeds will be retained for the benefit of the creditors of this bankruptcy estate in the same manner, priority, and extent as outlined in the Bankruptcy Code or other order of this Court.

3. The Court retains jurisdiction to interpret or enforce the terms of this Order.

IT IS SO ORDERED.

THIS ORDER WAS SIGNED AND ENTERED ELECTRONICALLY AS  
INDICATED AT THE TOP OF THE FIRST PAGE

APPROVED FOR ENTRY:

/s/ Justin T. Campbell  
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*Counsel for Jason Brubacher, with  
derivative standing on behalf of the  
bankruptcy estate*